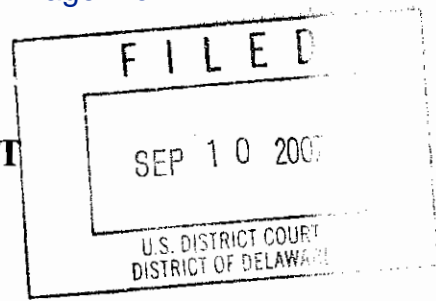


IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE



JAMES ST. LOUIS,

PLAINTIFF,

v.

LT. CHERYL MORRIS et al. ,

DEFENDANTS.

C.A. NO. 06-236-SLR

JURY TRIAL REQUESTED

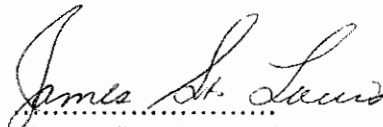
**MOTION FOR PROTECTION AND GAG ORDER**

Plaintiff asks this Court for a Motion for protection and a gag order for the following reasons:

1. As explained in Constand v. Cosby (E.D. Pa. 2005) 229 F.R.D. 472 "It is difficult to strike a balance between protecting the right to a fair trial and safe-guarding the rights of free expression." Rules of Prof'l Conduct, R. 3.6, **however** when it affects the security and safety of the witnesses the court must take action. When facing a dilemma some courts have entered some type of "gag order" limiting parties, counsels and witnesses from publicly discussing or intimidating through questioning facts that could and would change the integrity of the truth. (see State v. Grossberg No.9611007811[Del.Super. Ct. Mar.21,1996])
2. Enclosed are exhibits that have already been addressed in other actions to this court that upholds that these complaints are just newly discovered.
  1. Inmate witnesses being terminated after their names were issued in discovery
  2. Inmates being retaliated against in their present jobs after their names again listed as witnesses
  3. List of intimidating actions by supervising inmate to Lt. Morris against inmates who are keeping Plaintiff informed as to action pending and continuing in the kitchen of D.O.C.

4. Inmate witnesses being called into Lt. Morris' office and questioned about what their testimony will be and being told it could affect their job.
3. Plaintiff was walking in the yard and as he was meditating he came up to the gate where unbeknown to him one of the defendants from the kitchen had been on their way to pre trial and had stopped to talk to c/o Vandunk. As the plaintiff walk passes the defendant he told c/o Vandunk 'here comes a piece of shit'. Plaintiff never acknowledged defendant but did hear defendant start to explain the case at hand to the c/o. Ever since then plaintiff and c/o Vandunk have a different rapore.this has been happening all over the compound and non the plaintiff has been told that the same defendant is now transferred to the compound and could have direct contact with him.
4. Plaintiff has already advised the defendant's attorney about the retaliation to other witnesses as seen in letter include, but to no avail seeing these actions have not decreased but increased.
5. Plaintiff believes he has shown good cause for these two actions as there interference by defendants could and would change the factual evidence through their intimidation and actions. Since these actions have taken place the individual involved have filled grievances but to no avail; as the court can see in the one enclosed all that has happened is it is given to another defendant who is taken action to protect the whole and not address the procedures or illegal actions of the perpetrator.
6. Because of these examples and more not included plaintiff asks this Court to grant these Motions to protect the integrity of the truth and judicial system. But most of all to protect the welfare of the witnesses who have come forth to acknowledge their rights that have been taken and the treatment of those whom those actions have been addressed to.

DATE... 9/6/07

  
JAMES ST. LOUIS  
1181 PADDOCK RR.  
SMRYNA DE. 19977

**Certificate of Service**

I, James St. Louis, hereby certify that I have served a true

And correct cop(ies) of the attached: Motion : To Compel /

Protection & Gag order / Answer to states response upon the following  
to sever & injunctions  
parties/person (s): w/ evidence.

TO: Department of Justice  
State Office Building  
520 N. French St.  
Wilmington De 19801  
c/o Atty. Kelly

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TO: United States District  
Court for Delaware  
844 King Street  
Wilmington De. 19801  
c/o Court Clerk

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 7<sup>th</sup> day of ~~August~~ Sept., 2007

James St. Louis